

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
NUTTER, McCLENNEN & FISH, LLP,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. <u>13-cv-12366-FDS</u>
)	
RED LAMBDA, INC., and)	
BAHRAM YUSEFZADEH,)	[Filed in redacted form pursuant to the
)	Court's Sept. 5, 2013 Order]
Defendants.)	
_____)	

VERIFIED COMPLAINT

1. Plaintiff seeks to recover sums owed for legal services and to enforce a written contract under which defendant Red Lambda, Inc. was obligated to pay for those services. Plaintiff also seeks to recover from defendants Red Lambda, Inc. and Bahram Yusefzadeh for fraudulent misrepresentations and for unfair or deceptive acts or practices by those defendants in violation of M.G.L. c. 93A.

Jurisdiction and Venue

2. This is an action between citizens of different states in which the amount in controversy, without interest and costs, exceeds the sum or value specified in 28 U.S.C. § 1332.

3. Venue in this District is proper pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events that gave rise to the claims alleged herein occurred in this District, as alleged with more particularity hereinbelow.

Parties

4. Plaintiff Nutter, McClennen & Fish, LLP (“Nutter”) is a Massachusetts limited liability partnership engaged in the practice of law with a principal place of business at 155

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COUNT ONE
(Breach of Contract)

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COUNT THREE

(Against Defendants Yusefzadeh and Red Lambda under M.G.L. c. 93A, § 11)

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Prayers for Relief

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NUTTER, McCLENNEN & FISH, LLP

By its attorneys,

/s/ Michael A. Walsh

Michael A. Walsh (BBO #514875)

mw Walsh@nutter.com

Nutter McClennen & Fish, LLP

155 Seaport Blvd.

Boston, MA 02210

617-439-2000

Date: September 23, 2013